

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MARYLAND  
Baltimore Division**

**RE: MICHAEL ALLAN MCNEIL**

**Debtor**

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**MICHAEL ALLAN MCNEIL**

**Plaintiff**

**v.**

**STEVEN A. DRAZIN**

**Defendant**

\* **Case No. 12-18903 DER**

\* **Chapter 7**

\* **Adversary Proceeding No. 12-00783**

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**FILED**

**JAN 30 2013**

**U.S. BANKRUPTCY COURT  
DISTRICT OF MARYLAND  
BALTIMORE**


**PLAINTIFF'S ANSWERS AND OPPOSITION TO  
DEFENDANT'S MOTION TO DISMISS ADVERSARY ACTION**

**COMES NOW**, the Plaintiff and opposes the Defendant's Motion to Dismiss Adversary Complaint filed on January 14, 2013 and ask this court to deny it and states the following:

1. The Plaintiff admits to the allegations made in paragraph 1 of the Defendant's Motion To Dismiss Adversary Complaint.
2. The Plaintiff admits to the allegations made in paragraph 2 of the Defendant's Motion To Dismiss Adversary Complaint.
3. The Plaintiff admits to the allegations made in paragraph 3 of the Defendant's Motion To Dismiss Adversary Complaint.

4. The Plaintiff denies the allegations made in paragraph 4 of the Defendant's Motion To Dismiss Adversary Complaint. The Plaintiff further states that the relief being sought is that this court declare the Defendant's claims to be dischargeable in bankruptcy. Meaning the relieve being sought after is has to deal with dischargeability in any chapter of the Bankruptcy Code.
5. The Plaintiff admits to the allegations made in paragraph 5 of the Defendant's Motion To Dismiss Adversary Complaint.
6. The Plaintiff admits to the allegations made in paragraph 6 of the Defendant's Motion To Dismiss Adversary Complaint.
7. The Plaintiff denies to the allegations made in paragraph 7 of the Defendant's Motion To Dismiss Adversary Complaint.
8. The Plaintiff need not admit nor deny paragraph 8 since it is incorporating a opinion of Memorandum of Law.
9. The Plaintiff need not admit nor deny paragraph 9 since it is incorporating a opinion of Memorandum of Law and merely states more argument.
10. The Plaintiff admits to the allegations made in paragraph 10 of the Defendant's Motion To Dismiss Adversary Complaint.
11. The Plaintiff denies to the allegations made in paragraph 11 of the Defendant's Motion To Dismiss Adversary Complaint. The Plaintiff's case has been converted to chapter 7.
12. The Plaintiff has attached a Memorandum of Law which address the issues brought up by the defendant motion and ask this court to give it proper consideration.

**WHEREFORE**, the Plaintiff asks that the defendant's motion be denied. Or if the court should determine that the Plaintiff failed to meet pleading requirements that he be given leave to amend his complaint.



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**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy of the foregoing was by first class mail, postage prepaid on January 29, 2013:

**Cary C Jacobson**

THE DRAZIN LAW CENTER, P.A.  
10420 Little Patuxent Parkway  
Suite 100  
Columbia, MD 21044  
(Council For The Defendant)

**Brian A. Goldman**

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(Chapter 7 Trustee)

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**FILED**

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U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
GREENBELT